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Counsel to the Informal Group of
Holders of General Motors Unsecured Notes

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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|---|---------------------------|
| ----- | X |
| | : |
| In re | : Chapter 11 |
| | : |
| GENERAL MOTORS CORPORATION, <u>et al.</u> , | : Case No. 09-50026 (REG) |
| | : |
| | : (Jointly Administered) |
| Debtors. | : |
| ----- | X |

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the Informal Group of Holders of General Motors Unsecured Notes (the “Informal Noteholder Group”) hereby enters its appearance by and through its counsel, Paul, Weiss, Rifkind, Wharton & Garrison LLP, pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and that such party in interest hereby requests, pursuant to Bankruptcy Rules 2002 and 9007 and section 1109(b) of the Bankruptcy Code, that the names of the undersigned representatives be added to the mailing list maintained by the Clerk in the above-captioned cases, and that the Clerk and all other parties-in-interest in

these cases provide all notices and all papers served on any party, filed with the Court or delivered to the Office of the United States Trustee in the above-captioned cases, to all of the persons listed directly below:

Andrew N. Rosenberg (arosenberg@paulweiss.com)
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Counsel further requests that the Debtors' Noticing Agent add this Notice of Appearance to the Master Service List.

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes all of the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, cash-flow reports, requests or petitions, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these cases and any proceeding therein, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telecopier, telex, or otherwise filed or given with regard to the above-referenced cases and the proceedings therein, all of which shall be sent to all of the attorneys listed above.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall

be deemed to waive any right of the Informal Noteholder Group (i) to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (iii) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) to rights, claims, actions, defenses, setoffs, recoupments, or remedies to which the Informal Noteholder Group is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, recoupments, and remedies are expressly reserved hereby.

Dated: New York, New York
June 3, 2009

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

By: /s/ Andrew N. Rosenberg

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(A Member of the Firm)

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